

## AFFIDAVIT OF RAY E. PARADOWSKI

BEFORE the undersigned, an officer duly authorized by law to administer oaths, comes Ray Paradowski, who states the following:

1.

I am currently employed by National Starch and Chemical Corporation as Manager of National Starch's North Carolina operations. During the period 1974-1976 I was the plant manager for the Chas. S. Tanner Company at its manufacturing facilities in Greenville and Woodruff, South Carolina. The Chas. S. Tanner Company was acquired by National Starch in 1980.

2.

During the period 1974-1976, the Chas. S. Tanner Company arranged with Medley's Concrete Works, Route 7, Gaffney, South Carolina, for the shipment from such facilities of a number of drums of non-hazardous aqueous emulsion waste for disposal at a landfill owned by the Medleys.

3.

I have reviewed correspondence from the United States Environmental Protection Agency advising National Starch that it was a potentially responsible party for the surface cleanup of a farm owned by Ralph Medley. Correspondence from EPA further indicates that drums bearing the name Chas. S. Tanner Company as well as drums from other companies were removed from the Medley farm in an EPA cleanup during 1983.

4.

I have reviewed EPA's "ten point memorandum" relating to the cleanup at the Medley farm. It is my understanding that this memorandum was the basis for EPA's actions in undertaking the surface cleanup.

5.

As Plant Manager for the Chas. S. Tanner Company's manufacturing facilities, I am familiar with the products produced by the Chas. S. Tanner Company during the period 1974-1976 and the types of wastes that would have been sent to the Medley's for landfill disposal.

6.

During the period 1974-1976, the Chas. S. Tanner Company produced a number of products for the textile industry, adhesives, fabric softeners, paper coatings and other similar products. EPA's ten point memorandum identifies six chemicals found at

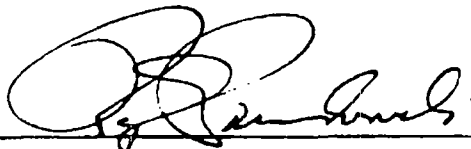
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the Medley site which are considered to be hazardous substances: aniline, methylene chloride, benzene, phenol, toluene, and vinyl chloride. None of these chemicals were purchased or used by the Chas. S. Tanner Company in the manufacture of its products during this period. Accordingly, none of these chemicals were in the waste sent by the Chas. S. Tanner Company to the Medleys' landfill.

7.

The files containing purchase orders for raw materials for Chas. S. Tanner's manufacturing facilities during 1974-1976 have been reviewed by employees of National Starch. All such files were located with the exception of those files for suppliers with names beginning with the letters "D through H" for 1974 which could not be located. The vendors would not have changed during 1975 or 1976 so I believe these are representative of the entire period. Examination of such purchase orders did not indicate any purchases of these six chemicals for use at such manufacturing facilities. In 1979, the Chas. S. Tanner Woodruff facility purchased toluene for use in certain products. For this reason, toluene was listed upon the Part A RCRA application which was filed for this facility in 1980. However, the first purchase of toluene for use at this facility occurred in 1979 several years after the business transactions with Medley referred to earlier. All purchase orders during 1974-1976 are available for review by EPA. Accordingly, I do not believe that any of the six chemicals identified by EPA came from Chas. S. Tanner's waste.



Ray E. Paradowski

SWORN TO AND SUBSCRIBED before me  
this 30 day of January, 1986.

  
NOTARY PUBLIC

My Comm. Expires:

February 6, 1986